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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2011 Grand Jury

CR 12-00543

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy
to Distribute Methamphetamine;
21 U.S.C. §§ 841(a)(1),
841(b)(1)(A)(viii):
Distribution of
Methamphetamine; 18 U.S.C.
§ 2: Aiding and Abetting}

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
MANUEL CUANRIQUEZ,)
aka "Wacky," and)
JOSE GUADALUPE HERNANDEZ,)
aka "Serio,")
Defendants.)

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

A. OBJECT OF THE CONSPIRACY

Beginning on a date unknown, and continuing to on or about
May 16, 2012, in Los Angeles County, within the Central District
of California, and elsewhere, defendants MANUEL CUANRIQUEZ, also
known as ("aka") "Wacky" ("CUANRIQUEZ"), and JOSE GUADALUPE
HERNANDEZ, aka "Serio" ("HERNANDEZ"), and others known and
SL: VOCS

1 unknown to the Grand Jury, conspired and agreed with each other
2 to knowingly and intentionally distribute at least 50 grams of
3 methamphetamine, a schedule II controlled substance, in violation
4 of Title 21, United States Code, Sections 841(a)(1) and
5 841(b)(1)(A)(viii).

6 B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE
7 ACCOMPLISHED

8 The object of the conspiracy was to be accomplished, in
9 substance, as follows:

10 1. Defendant CUANRIQUEZ would obtain methamphetamine to
11 sell to customers.

12 2. Defendant HERNANDEZ would assist defendant CUANRIQUEZ
13 during the sale of the methamphetamine to customers.

14 C. OVERT ACTS

15 In furtherance of the conspiracy and to accomplish the
16 object of the conspiracy, defendants CUANRIQUEZ and HERNANDEZ,
17 and others known and unknown to the Grand Jury, committed various
18 overt acts, on or about the following dates, within the Central
19 District of California, and elsewhere, including, but not limited
20 to, the following:

21 1. On September 28, 2009, defendant CUANRIQUEZ told a
22 confidential government informant ("CI") that CUANRIQUEZ could
23 obtain a quarter-pound of methamphetamine to sell to the CI and
24 that it was good quality methamphetamine.

25 2. On September 29, 2009, defendant CUANRIQUEZ, using coded
26 language in a telephone conversation, arranged to meet with the
27 CI once CUANRIQUEZ had obtained the methamphetamine from his
28 source of supply.

1 3. On September 29, 2009, defendants CUANRIQUEZ and
2 HERNANDEZ met with the CI for the purpose of selling
3 methamphetamine to the CI.

4 4. On September 29, 2009, defendant CUANRIQUEZ provided
5 methamphetamine wrapped in cellophane to the CI and unwrapped the
6 methamphetamine so that the CI could inspect the methamphetamine.

7 5. On September 29, 2009, defendant HERNANDEZ took out
8 additional cellophane so that the methamphetamine could be re-
9 wrapped once the CI had inspected the methamphetamine.

10 6. On September 29, 2009, defendants CUANRIQUEZ and
11 HERNANDEZ re-wrapped the methamphetamine once it was examined by
12 the CI so that it could be distributed to the CI in exchange for
13 payment.

14 7. On September 29, 2009, defendant CUANRIQUEZ accepted
15 approximately \$3,800 from the CI in exchange for the
16 methamphetamine.

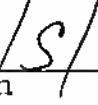
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1 COUNT TWO

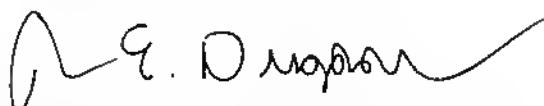
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii); 18 U.S.C. § 2]

3 On or about September 29, 2009, in Los Angeles County,
4 within the Central District of California, defendants MANUEL
5 CUANRIQUEZ, also known as ("aka") "Wacky," and JOSE GUADALUPE
6 HERNANDEZ, aka "Serio," while aiding and abetting each other,
7 knowingly and intentionally distributed at least 50 grams, that
8 is, approximately 109.2 grams, of methamphetamine, a schedule II
9 controlled substance.

10 A TRUE BILL

11
12 
13 Foreperson

14 ANDRÉ BIROTTÉ JR.
15 United States Attorney

16 

17 ROBERT E. DUGDALE
18 Assistant United States Attorney
Chief, Criminal Division

19 ELIZABETH R. YANG
20 Assistant United States Attorney
21 Chief, Violent & Organized Crime Section

22 CHRISTOPHER BRUNWIN
23 Assistant United States Attorney
24 Deputy Chief, Violent & Organized Crime Section

25 SARAH LEVITT
26 Assistant United States Attorney
27 Violent & Organized Crime Section